

REMARKS

This amendment is filed with a Request for Continued Examination, as the amendment is expected require further consideration and/or search due to newly recited features, e.g., a "solvent-free" composition. This application is amended in a manner to place it in condition for allowance at the time of the next Official Action.

Status of the Claims

Claims 13, 14, 16, 21, and 22 are amended. Claims 32 and 33 are new.

Support for the amendment to the claims may be found, for example, at page 1, lines 10-12, page 2, lines 8-18, 26-29, and 34-37, page 3, lines 1-4 and 32, and page 4, line 1.

Claims 8, 9, 13-17, 21-23, and 24-33 remain in this application.

Claim Rejections-35 USC §112

Claims 13, 14, 21, 22 and 29 were rejected under 35 U.S.C. §112, second paragraph, for being indefinite. This rejection is respectfully traversed for the reasons below.

The position of the Official Action was that the anti stick agent described includes two different materials and ranges that are outside those recited in the independent claims.

The claims are now amended to clarify that the independent claims may include two different materials.

Therefore, withdrawal of the rejection is respectfully requested.

**Claim Rejections-35 USC §103**

Claims 8-9, 15-17, and 23-28 were rejected under 35 USC §103(a) as being unpatentable over AOKI et al. US 5,364,888 ("AOKI") in view of LOPES et al. US 4,681,714 ("LOPES"). This rejection is respectfully traversed.

Amended independent claims 8 and 16 and new independent claim 32 require a mold and a coating on the mold, wherein the coating, or stripping composition is liquid and solvent free. The purpose of the composition is for release of a composite material formed in the mold.

AOKI is directed to a coating to be used as a back coating agent for adhesive tapes, protective coating agents for metals or plastic and a coating base, and, specifically, the coating is applied paper sheets, various plastic films, and metallic foils. See, e.g., column 5, lines 45-52. AOKI further discloses that the coating may be used after dilution with organic solvents, which are excluded by the independent claims recitation of "solvent-free". See, e.g., column 5, lines 42-43.

The Official Action acknowledges that AOKI does not apply such a coating to a mold.

LOPES was offered for teaching the release coatings for molds.

The position of the Official Action was that it would have been obvious to coat a mold with the coating of AOKI because LOPES teaches coating a mold with a release agent increase the efficiency of manufacturing because one of ordinary skill in the art would have been able to carry out such a substitution to achieve a predictable result.

However, the claimed invention is not an obvious, predictable result. Indeed, the claimed invention has been developed after numerous ineffective results, this during a heavy and long lasting search.

Moreover, the proposed combination fails to render obvious the claimed invention for at least two reasons:

I. The coatings are not art-recognized equivalents.

The position of the Official Action is based on the assumption that the adhesive tape backing/protective coating of AOKI and the multiple release mold coating of LOPES are equivalent.

However, there is no suggestion in either document that these two coatings are art recognized equivalents. As pointed out in MPEP 2144.06, "In order to rely on equivalence as a rationale supporting an obviousness rejection, the equivalency must be recognized in the prior art, and cannot be based on

applicant's disclosure or the mere fact that the components at issue are functional or mechanical equivalents." *In re Ruff*, 256 F.2d 590, 118 USPQ 340 (CCPA 1958). (Emphasis Added).

Indeed, the documents disclose different functions for the coatings.

The function of the coating of AOKI is to provide sufficient adherence between an adhesive substance and a substrate, and reduce the force required separate the adhesive substance from the substrate. That is, AOKI is interested in facilitating the removal of the adhesive tape from the backings, by applying a coating agent onto the backings. Adhesive tape backings are intended to be adhered to the adhesive tapes, as evidenced by the 20 hours of curing disclosed in column 6 of AOKI.

The function of the coating of LOPES, however, is to eliminate adherence between a cured material and a substrate. The cured material is not disclosed as being adhesive *per se*. Rather, LOPES is interested in eliminating the adherence that results during curing of a molded material, i.e., from the physical fit between the molded material and the mold or the chemical bonding between the molded material and the mold. See, column 1, lines 24-55 of LOPES.

Thus, one of ordinary skill in the art would have had no reason to combine these documents, as they address different

types of adherence problems involving different materials with different intended uses.

II. The combination fails to teach the claimed invention.

LOPES requires that the coatings for molds, i.e., with walls, contain an organic solvent in order reduce the viscosity of the composition and facilitate the application of the composition to the shape-determining surface. See, e.g., column 4, lines 60-68.

AOKI discusses organic solvents may be used for dilution. However, AOKI is solely concerned with flat or planar surfaces, not a mold with a shape-determining surface, e.g., one comprising walls.

Thus, even if one were to combine these documents, the combination fails to teach the claimed invention, as both documents recognize organic solvents for diluting or thinning the composition, and this dilution is necessary for the purpose of coating mold surfaces. The independent claims, however, require a solvent-free composition.

Therefore, the combination does not render obvious the independent claims 8 and 16 and claim 32, and dependent claims 9, 15, 17, and 23-28 and withdrawal of the rejection is respectfully requested.

Claims 13, 14, 21-23 and 29-30 were rejected under 35 USC §103(a) as being unpatentable over AOKI in view of LOPES, further in view of ECKBERG et al. US 5,650,453 ("ECKBERG"). This rejection is respectfully traversed.

New claims 32 and 33 are directed to the two vinyl ether compounds described in, for example, claim 13 and 14.

As discussed above, the combination of AOKI and LOPES does not render obvious claimed coating on a mold, or method of coating on a mold.

ECKBERG was offered for teaching the use of dodecyl monovinyl ether and 1,4 cyclohexane dimethanol ether in a release coating, e.g., in claim 1, lines 51-58 of ECKBERG. However, like AOKI, the "release" function of the coatings of ECKBERG is relative to adhesive substances.

Thus, as ECKBERG fails to suggest that a coating for the purpose and function required LOPES, ECKBERG does remedy the shortcomings of the combination of AOKI and LOPES for reference purposes. There would be no reason for one of ordinary skill in the art to include such vinyl ethers for the purpose and function of LOPES.

Therefore, the combination fails to render obvious claims 13, 14, 21-23, 29, 30, 32 and 33, and withdrawal of the rejection is respectfully requested.

Claim 31 was rejected under 35 USC §103(a) as being unpatentable over AOKI in view of LOPES, further in view of

DMITROFF et al. US 3,321,019 ("DMITROFF"). This rejection is respectfully traversed.

DMITROFF is offered for teaching molding a composite fiberglass helicopter blade in a mold. However, regardless of the ability of DMITROFF to teach that for which it is offered, DMITROFF does not remedy the shortcomings of the combination of AOKI and LOPES. DMITROFF does not recognize a release coating for adhesive tape backings and a multi-release mold coating are art recognized equivalents.

Therefore, withdrawal of the rejection is respectfully requested.

Conclusion

In view of the amendment to the claims and the foregoing remarks, this application is in condition for allowance at the time of the next Official Action. Allowance and passage to issue on that basis is respectfully requested.

Should there be any matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to our credit card which is being paid online simultaneously herewith for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON

/Robert A. Madsen/

Robert A. Madsen, Reg. No. 58,543  
209 Madison Street, Suite 500  
Alexandria, VA 22314  
Telephone (703) 521-2297  
Telefax (703) 685-0573  
(703) 979-4709

RAM/jr